



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
Research Triangle Park, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

September 1, 2022

Mr. David Ailor  
President  
American Coke and Coal Chemicals Institute  
25 Massachusetts Avenue, N.W.  
Suite 800  
Washington, D.C. 20001  
*dailor@accci.org*

**Re: Request to Provide Information Pursuant to the Clean Air Act (CAA)**

Dear Mr. Ailor:

As you know, the U.S. Environmental Protection Agency (EPA) recently issued Clean Air Act (CAA) section 114 information requests to nine coke facilities, which included six facilities that are members of the American Coke and Coal Chemicals Institute's Coke Oven Environmental Task Force (COETF). The requests were sent to COETF and representatives of the six facilities on June 29, 2022, and included a questionnaire (Enclosure 1) and a request for source testing (Enclosure 2). In this correspondence, EPA is responding to comments and concerns from COETF and facility representatives regarding several items in the CAA section 114 information requests.

On August 2, 2022, COETF and facility representatives sent Mr. Charles French and Dr. Donna Lee Jones of the U.S. EPA a letter outlining comments on the CAA section 114 information request. Subsequently, on August 9, 2022, EPA staff met virtually with COETF and facility representatives. After further review and considerations of those comments and concerns, EPA is modifying five items in the June 29, 2022, request as follows:

- We are extending the Enclosure 1 response due date 25 days, so that the Enclosure 1 response is now due September 27, 2022;
- We are not requiring flare testing for coke oven batteries because of the safety issues associated with the flare flame being too close to the top of the battery;
- We will accept coke oven gas composition analyses in lieu of coke by-product recovery plant (CBRP) flare testing for samples taken at other points in the CBRP to also address safety issues related to flare testing and/or to account for situations where there are no ports;
- We are allowing submission of previous test reports in lieu of new testing as long as the

tests: (1) were performed within the past 5 years (2017 or more recently); (2) used the same methods as those required in the CAA section 114 request; (3) were performed at conditions representative of current operations; and (4) yield emissions data that are presented in the units specified in Enclosure 2 or can be converted to those units with available information; and

- We are allowing use of Method TO-15 instead of Method TO-15A.

We also are clarifying several items in the June 29, 2022, CAA section 114 information request as shown in the attached table.

With the caveat discussed further below, the remainder of Enclosure 1 and Enclosure 2, including the following items, have not changed:

- Due dates for all requirements other than the 25-day extension for Enclosure 1 stated above;
- Interior and fenceline fugitive testing requirements;
- EPA Method 303 tests taken simultaneously from the bench and yard; and
- Testing of CBRP cooling tower inlets with the Texas Commission on Environmental Quality Appendix P method for volatile hazardous air pollutants and total hydrocarbons.

We note that we have not yet reached a decision concerning one change that COETF requested, addressing requirements to perform EPA Method 303 for visible emissions observations from the coke battery bench. COETF claims that significant worker safety concerns exist with having Method 303 observers working from the bench based on historical multiple bench related fatalities (11 since 1984) when other work was being performed on the bench. We think there may be ways to revise this requirement to minimize any safety concerns. However, we need to gather more information and conduct more analyses regarding this issue before we determine whether to keep such a requirement in the CAA section 114 request. At this time, although the requirement is still in Enclosure 2, facilities can refrain from conducting the Method 303 requirements from the bench until further notice.

Thank you for your assistance in this effort. Your responses to the CAA section 114 request will provide comprehensive information about the coke manufacturing source categories, which will lead to a more effective rulemaking. Any questions about this information request should be directed to Dr. Donna Lee Jones in the EPA's Sector Policies and Programs Division by email at [jones.donnalee@epa.gov](mailto:jones.donnalee@epa.gov).

Sincerely,

**PENNY  
LASSITER**

Penny Lassiter  
Director

Sector Policies and Programs Division

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Enclosure

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